2	Kevin S. Sinclair, NV Bar No. 12277  ksinclair@sinclairbraun.com  SINCLAIR BRAUN KARGHER LLP  15260 Ventura Blvd., Suite 715		
3	Sherman Oaks, California 91403 Telephone: (213) 429-6100 Facsimile: (213) 429-6101		
5	Attorneys for Defendant NORTH AMERICAN TITLE INSURANCE COMPANY		
7	DESIGNATED LOCAL COUNSEL FOR SERVICE PER L.R. IA 11-1(b)		
8 9 10	Janet Trost, Esq. 501 S. Rancho Drive Suite H-56 Las Vegas, Nevada 89106		
11	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
12			
13	BANK OF AMERICA, N.A.,	Case No.: 2:21-cv-00415-KJD-VCF	
14 15 16	Plaintiff, vs.  NORTH AMERICAN TITLE INSURANCE	STIPULATION AND ORDER CONTINUING DEADLINE TO REPLY AND OPPOSE COUNTERMOTION FOR PARTIAL SUMMARY JUDGMENT (ECF NO. 32)	
17	COMPANY,  Defendant.	(FIRST REQUEST)	
19	COMES NOW defendant North American Title Insurance Company ("North American")		
20	and plaintiff Bank of America, N.A. ("BANA"), by and through their respective attorneys of		
21	record, hereby agree and stipulate as follows:		
22	1. On March 17, 2023, North American filed its motion to dismiss BANA's		
23	complaint (ECF No. 28);		
24	2. On March 31, 2023, BANA filed	a response to North American's motion to	
25	dismiss and filed a countermotion for partial summary (ECF Nos. 31, 32);		
26	3. North American requests a thirty-one (31) day extension of its deadline to reply in		
27	support of its motion to dismiss and a seventeen (17) day extension of its deadline to oppose		
28	BANA's countermotion for partial summary judgment, such that both filings shall be due on		

1	Monday, May 8, 2023, to afford North American additional time to respond to the legal	
2	arguments set forth in BANA's response and countermotion;	
3	4. BANA does not oppose the requested extension;	
4	5. This is the first request for an extension which is made in good faith and not for	
5	purposes of delay;	
6	IT IS SO STIPULATED that North American's deadline to reply in support of its motion	
7	to dismiss and oppose BANA's countermotion for partial summary judgment is hereby extended	
8	through and including May 8, 2023.	
9	Dated: April 4, 2023	SINCLAIR BRAUN KARGHER LLP
10		By: <u>/s/-Kevin S. Sinclair</u> KEVIN S. SINCLAIR
11		Attorneys for Defendant NORTH AMERICAN TITLE INSURANCE
12		COMPANY
13	Dated: April 4, 2023	WRIGHT FINLAY & ZAK, LLP
14		By: <u>/s/-Lindsay D. Dragon</u> LINDSAY D. DRAGON
15		Attorneys for Plaintiff BANK OF AMERICA, N.A.
16	IT IS SO ODDEDED	Drivit of Ameliaen, M.A.
17	IT IS SO ORDERED.	
18	Dated this 5th day of April, 2023	3.
19		KENT J. DAWSON
20		UNITED STATES DISTRICT JUDGE
21		
22		
23		
24		
25		
26		
27 28		
7.0	1	

